

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

**DECLARATION OF SARA C. FISH
IN SUPPORT OF DEFENDANTS' BILL OF COSTS**

I, Sara C. Fish, hereby declare:

1. I am a Principal with the law firm Fish & Richardson P.C., and counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("Samsung"). I make this declaration in support of Samsung's Bill of Costs. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.

2. I have reviewed invoices that have been paid—or have been approved to be paid with payment pending by our firm or client—for costs incurred in the above-captioned action for services that were actually and necessarily performed.

3. Attached hereto as **Exhibit A** is a detailed itemization of the costs included in Samsung's Bill of Costs.

4. Attached hereto as **Exhibit B-G** are compilations of like-invoices related to entries on each line of form AO 133, filed herewith.

5. Attached hereto **Exhibit B** provides invoices for the costs of “Fees for service of summons and subpoena” on form AO 133, which total \$4,926.50.

6. Attached hereto **Exhibit C** provides invoices for the costs of “Fees for printed or electronically recorded transcripts necessarily obtained for use in the case” on form AO 133, which total \$159,123.59. Exhibit C includes (a) invoices for the costs of deposition transcript, and (b) invoices for the costs of video recording of depositions.

7. Attached hereto **Exhibit D** provides invoices for the costs of “Fees and disbursements for printing” on form AO 133, which total \$22,576.97.

8. Attached hereto **Exhibit E** provides invoices for the costs of “Fees for witnesses” on form AO 133, which total \$6,705.00. The attached invoice is a copy of a hotel folio reflecting a total bill of \$98,780.67, of which only the applicable witnesses and number of nights stays are included on form AO 133, as detailed on **Exhibit A**.

9. Attached hereto **Exhibit F** provides for the costs of “Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case” on form AO 133, which total \$421,991.84. Exhibit F includes (a) invoices from Fronteo Korea Inc. for collecting, duplicating and transmitting ESI from Samsung to Fish & Richardson for production in discovery in this case, (b) graphics services for preparation for and in support of trial, and (c) prior art production and reproduction costs.

10. Attached hereto **Exhibit G** provides for the costs of “Other costs,” which total \$15,000. **Exhibit G** includes the cost billed to Samsung for one mediation session before Judge Folsom in this matter, which is advised by the Court pursuant to the Court’s Docket Control Order.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of April, 2025, in Atlanta, GA.

/s/ Sara C. Fish

Sara C. Fish